

From: [Hall, Steven G.](#)
To: [Earl Liverman/R10/USEPA/US@EPA](#)
Subject: RE: Avery - Draft Streamlined Risk Assessment review
Date: 02/03/2010 12:07 PM

Earl, I agree with you. We definitely need to do source removal, and if the site were located closer to an appropriate landfill, I would think off-site disposal would be something to consider. Treatment will probably be necessary, although which one will depend on the numbers.

Thanks,
Steve

From: Liverman.Earl@epamail.epa.gov [mailto:Liverman.Earl@epamail.epa.gov]
Sent: Wednesday, February 03, 2010 1:58 PM
To: Hall, Steven G.
Subject: Re: Avery - Draft Streamlined Risk Assessment review

Exactly what I wanted. By the way, now that you're familiar with the document, what's your preferred alternative? I don't subscribe to sediment natural attenuation or a recovery system operating for 10, 30, or 50 years. I believe treatment is needed, but uncertain exactly what.

From: "Hall, Steven G." [SGHall@ene.com]
Sent: 02/03/2010 11:15 AM PST
To: Earl Liverman
Subject: RE: Avery - Draft Streamlined Risk Assessment review

Earl -

I'm not sure I fully understand your question. Are you asking if Alma reviewed the draft EE/CA in the context of the requirements for a streamlined risk assessment in the EE/CA process, rather than a full risk assessment? If that's the right question, then yes, Alma did review it based on the requirements of a streamlined risk assessment. In an e-mail to me, she made the following comment:

HOWEVER...

Because this is just an EE/CA (and not an RI/FS), risk calculations may not even be necessary if the CSM and COPC screening are completed thoughtfully and thoroughly. The SRE's are supposed to be simple and can be just a simple screening, particularly if it is assumed that additional work will be required on this site in the future due to the LNAPL and they are just trying to efficiently identify the main COPCs and exposure pathways/media. Since Golder decided to do risk calculations, they opened the door and should now at least go through the process using appropriate assumptions and exposure pathways to identify those analytes, exposure media, and exposure pathways of greatest potential risk.

Earl, I hope this addresses your question. Please let me know if I need to provide additional information.

Thanks,
Steve

From: Liverman.Earl@epamail.epa.gov [mailto:Liverman.Earl@epamail.epa.gov]
Sent: Wednesday, February 03, 2010 12:51 PM
To: Hall, Steven G.
Subject: Re: Avery - Draft Streamlined Risk Assessment review

Are the comments appropriate for and consistent with an EE risk evaluation? In other words, are the comments responsive to what was submitted v. from the perspective of a risk assessment?

From: "Hall, Steven G." [SGHall@ene.com]
Sent: 02/03/2010 10:18 AM PST
To: Earl Liverman
Cc: "Feldpausch, Alma" <AFeldpausch@ene.com>
Subject: Avery - Draft Streamlined Risk Assessment review

Earl -

I've attached a draft preliminary review of the streamlined risk assessment by Alma Feldpausch, one of our toxicologists. I summarized her general comments in the earlier e-mail to you, but her draft memo is very brief yet thorough and provides additional details about some of the issues with the draft EE/CA.

Please let us know if you have any questions.

Thanks,
Steve

Steve Hall
START Removal Project Leader
Ecology and Environment, Inc.
(206) 920-1739 (cell)
sghall@ene.com